

For Six Month Period Ending DEC 4 1999  
(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant (b) Registration No.

Arnold & Porter

1750

(c) Business Address(es) of Registrant

555 - 12th Street, N.W.  
Washington, D.C. 20004-1206

2. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:  
(1) Residence address Yes ☐ No ☐  
(2) Citizenship N/A Yes ☐ No ☐  
(3) Occupation Yes ☐ No ☐

(b) If an organization:  
(1) Name Yes ☐ No ☒  
(2) Ownership or control Yes ☐ No ☒  
(3) Branch offices Yes ☒ No ☐

(c) Explain fully all changes, if any, indicated in items (a) and (b) above.  
Arnold & Porter's London office moved on September 18, 1999 to:  
Tower 42  
25 Old Broad Street  
London, England EC2N 1HQ

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**

3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.  
Yes ☐ No ☐ N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐ N/A

If no, please attach the required amendment. N/A

1 The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (a waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
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\*\*\* See Attachment 4A \*\*\*

- (b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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\*\*\* See Attachment 4B \*\*\*

5. (a) Has any person named in item 4(b) rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒

If yes, identify each such person and describe his service.

\*\*\* \*/ However, see Attachment 5A \*\*\*

- (b) Have any employee or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated
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- (c) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement. N/A

## II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of termination*

8. Have you acquired any new foreign principal<sup>2</sup> during this 6 month reporting period?

Yes ☒

No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

Republic of Kazakhstan, No. 11 Beibit Shalik Street  
Asatawa, Kazakhstan  
Government of Panama, Panama City, Panama

October 1999  
August 1999\*

\* Prior to that date, Registrant represented this foreign principal in matters that did not require registration.

9. In addition to those named in Items 7 and 8, if any, list foreign principals<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Republic of Venezuela  
State of Israel

### 10. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A<sup>3</sup> Yes ☒ No ☐  
Exhibit B<sup>4</sup> Yes ☒ No ☐

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

2 The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

3 The Exhibit A, which is filed on form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

4 The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

### III - ACTIVITIES

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11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

\*\*\* See Attachment 11A \*\*\*

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places, of delivery, names of speakers and subject matter.

\*\*\* See Attachment 12A \*\*\*

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

N/A

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5 The term "political activities" means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government, a foreign country or a foreign political party.

## IV - FINANCIAL INFORMATION

## 14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why. N/A

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies<sup>6</sup>

Date	From Whom	Purpose	Amount
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\*\*\* See Attachment 14A \*\*\*

Total

## (b) RECEIPTS - FUND RAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fund raising campaign<sup>7</sup>, any money on behalf of any foreign principal named in items 7, 8, and 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D to your registration? Yes ☐ No ☐ N/A

If yes, indicate the date the Exhibit D was filed. Date N/A

## (c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information: N/A

Name of foreign principal	Date received	Description of thing of value	Purpose
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6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. (See Rule 201(e).)

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign named in Items 7, 8, and 9 of this statement?      Yes ☒      No ☐

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

N/A

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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\*\*\* See Attachment 15A \*\*\*

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Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, and 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information: N/A

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐No ☒

If yes, furnish the following information: \*/

Date	Amount or thing of value	Name of political organization	Name of candidate
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\*/ \*\*\* See Attachment 15C \*\*\*

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

**V - INFORMATIONAL MATERIALS**

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials<sup>12</sup>?  
 Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN SECTION V.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Magazine or newspaper articles | <input type="checkbox"/> Motion picture films            | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Advertising campaigns  | <input type="checkbox"/> Press releases                 | <input type="checkbox"/> Pamphlets or other publications | <input type="checkbox"/> Lectures or speeches |
| <input type="checkbox"/> Other (specify) _____  |   |  |   |

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Public Officials      | <input type="checkbox"/> Newspapers                   | <input type="checkbox"/> Libraries                |
| <input type="checkbox"/> Legislators           | <input type="checkbox"/> Editors                      | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies   | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups       |
| <input type="checkbox"/> Other (specify) _____ |   |   |

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



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**VI--EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

February 8, 2000

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(Type or print name under each signature<sup>13</sup>)

Eli Whitney Debevoise II

Eli Whitney Debevoise II

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13 This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**UNITED STATES DEPARTMENT OF JUSTICE  
FARA REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530**

**NOTICE**

Please answer the following questions and return this sheet in triplicate with your Supplemental Statement:

1. Is your answer to Item 16 of Section V (Informational Materials - page 8 of Form CRM-154, formerly Form OBD-64-Supplemental Statement):

YES \_\_\_\_\_ or NO   x  

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

YES \_\_\_\_\_ or NO   \*/  

(If your answer to question 2 is "yes" please forward for our review copies of all material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Eli Whitney Debevoise II  
Signature

February 8, 2000  
Date

Eli Whitney Debevoise II

Please type or print name of  
signatory on the line above

Partner

Title

\*/ The Registrant did not disseminate any of the types of materials listed in question 2; the only materials disseminated were materials filed in the course of litigation or established agency proceedings.

ATTACHMENT 4A

- 4.(a) Have any persons ceased acting as partners, officers, directors, or similar officials of the registrant during this 6-month reporting period?

X Yes

\_\_\_ No

If yes, furnish the following information:

<u>Name</u>	<u>Position</u>	<u>Date Connection Ended</u>
Paul T. Denis	Partner	06/18/99
Lynda M. Clarizio	Partner	07/31/99

In addition, the following partner, who has previously filed a Short Form Registration Statement, is not engaging in registrable activities on behalf of any of the Registrant's foreign principals, and his Short Form Registration Statements are terminated as of the date indicated:

<u>Name</u>	<u>Position</u>	<u>Short Form Registration Terminated as of:</u>
Jeffrey Smith	Partner	November 23, 1999

**ATTACHMENT NO. 4B**

4. (b) Have any persons become partners, officers, directors or similar officials during this 6-month reporting period?

  X   Yes                             No

If yes, furnish the following information:

<b><u>Name</u></b>	<b><u>Residence Address</u></b>	<b><u>Citizenship</u></b>	<b><u>Position</u></b>	<b><u>Date Assumed</u></b>
Grant Bagley	1101 Francis Avenue Baltimore, MD 21227	United States	Partner	12/01/99
Leonard Becker	6144 31 <sup>st</sup> Street, N.W. Washington, DC 20015	United States	Partner	09/07/99
Brooksley Born	2319 Tracy Place, N.W. Washington, DC 20008	United States	Partner	09/07/99
Tim Frazer	Flat 3, 282 Devonshire Road Forest Hill, London SE23 3TH England	England	Partner	11/01/99
Joseph G. Howe	26 Hesketh Street Chevy Chase, MD 20815	United States	Partner	08/02/99
Susan Lee	1503-B Swann Street, N.W. Washington, DC 20009	United States	Partner	09/07/99
Robert Litt	4000 Rosemary Street Chevy Chase, MD 20815	United States	Partner	09/27/99
Daniel Waldman	3052 P Street, N.W. Washington, DC 20007	United States	Partner	09/07/99

Attachment 5A

5. Has any person named in Item 4 rendered services directly in furtherance of any foreign principal?

☐

Yes

☒

No

\*/

If yes, identify each such person and describe his services.

\*/ However, the following person, who became a partner of the Registrant during an earlier reporting period, began to render services to one or more of the Registrant's foreign principals during this period: Jeffrey H. Smith.

## **ATTACHMENT 11A**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement?

X Yes

     No

If yes, identify each such foreign principal and describe in full detail your activities and services:

### **Republic of Venezuela**

The Registrant rendered advice to the foreign principal on U.S. laws, regulations and policies concerning government bond offerings in international financial markets and related taxation issues, as well as advice on the registration of debt securities with the U.S. Securities and Exchange Commission. The Registrant represented the foreign principal in connection with financing from the U.S. Export-Import Bank. The Registrant also rendered advice and provided services to the foreign principal with respect to the restructured Venezuelan external debt and compliance by the foreign principal with certain debt covenants. The Registrant also represented a separate Venezuelan public sector entity controlled by the foreign principal in commercial litigation in the United States.

### **State of Israel**

The Registrant rendered advice to the foreign principal with respect to various financing vehicles, U.S. laws, regulations and policies relating to taxation, international trade, economic, financial matters, and privatization. The Registrant also provided assistance with various financing transactions. The Registrant also provided advice concerning existing, proposed and pending foreign aid and international trade-related legislation. In addition, the Registrant provided consultation concerning U.S. government procurement developments affecting Israel.

### **Government of Panama**

The Registrant rendered advice to the foreign principal on U.S. securities laws and international commercial arbitration. The Registrant also met with government officials concerning U.S. treaty obligations regarding environmental clean up.

### **Republic of Kazakhstan**

The Registrant rendered advice to the foreign principal on issues relating to the strengthening of U.S. – Kazakhstani relations.

## Attachment 12A

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

(xx) Yes      ( ) No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give the details as to dates, places of delivery, names of speakers and subject matter.

### State of Israel

The Registrant had a meeting on July 6, 1999, with Deputy U.S. Trade Representative Richard Fisher, Carol Mille from the USTR Textile Office, William Busis from the USTR Office of General Counsel, Israel Economic Minister Ohad Marani, and Israel Assistant Economic Minister Rachel Hirschler concerning U.S. trade legislation.

### Government of Panama

The Registrant met on May 27, 1999 with U.S. Secretary of State Madeline Albright, Stuart Eizenstadt, Peter Romero and Frank Loy to discuss U.S. - Latin America relations. The Registrant met on June 30, 1999 with David Sandalon and Ian Bowles of the Council on Environmental Quality, and Ambassador Fernando Eleta of Panama to discuss U.S. obligations for environmental clean-up in the Panama Canal zone. The Registrant had a meeting on October 16, 1999 with Undersecretary of State Thomas Pickering to discuss U.S. - Panama relations.

**ATTACHMENT NO. 14A**

14. (a) **Receipts -- Monies**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

  X   Yes                             No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

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**Note: The following information relates to activities that are non-registrable, as well as activities that are registrable.**

**The substantial majority of monies received during this period was for services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended.**

**Note: The services to which these receipts relate may have been performed in a prior period.**

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State of Israel (Note: Includes Registrable and/or Non-Registrable Activities)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
06/08/99	State of Israel	Fees	\$6,326.12
06/08/99	State of Israel	Disbursements	250.00
06/08/99	State of Israel	Fees	1,725.11
06/08/99	State of Israel	Disbursements	1,044.46
06/08/99	State of Israel	Fees	9,801.63
06/08/99	State of Israel	Disbursements	31.70
06/08/99	State of Israel	Fees	6,000.00
06/08/99	State of Israel	Disbursements	962.75
06/28/99	State of Israel	Fees	9,609.06
06/28/99	State of Israel	Disbursements	224.27
06/28/99	State of Israel	Fees	6000.00
06/28/99	State of Israel	Disbursements	61.11
08/02/99	State of Israel	Fees	9,222.19
08/02/99	State of Israel	Disbursements	611.14
08/02/99	State of Israel	Fees	6,000.00
08/02/99	State of Israel	Disbursements	19.35
08/11/99	State of Israel	Fees	3,840.69
08/11/99	State of Israel	Disbursements	832.31
08/11/99	State of Israel	Fees	6,323.63
08/11/99	State of Israel	Disbursements	339.52
08/24/99	State of Israel	Fees	11,945.25



receipts cont'd.

08/24/99	State of Israel	Disbursements	1,986.50
09/03/99	State of Israel	Fees	6,000.00
09/03/99	State of Israel	Disbursements	312.40
09/03/99	State of Israel	Fees	9,156.91
09/03/99	State of Israel	Disbursements	676.42
09/17/99	State of Israel	Fees	5,025.37
09/17/99	State of Israel	Disbursements	238.77
09/17/99	State of Israel	Fees	13,443.75
09/17/99	State of Israel	Disbursements	586.28
10/19/99	State of Israel	Fees	9,571.71
10/19/99	State of Israel	Disbursements	261.62
10/19/99	State of Israel	Fees	6,000.00
10/19/99	State of Israel	Disbursements	<u>84.83</u>
		Total Fees	\$125,991.42
		Total Disbs.	8,523.43

Government of Venezuela (Note: Includes Registrable and/or Non-Registrable Activities)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
09/23/99	Government of Venezuela	Fees	\$59,292.50
09/23/99	Government of Venezuela	Disbursements	4,793.63
11/15/99	Government of Venezuela	Fees	129,295.32
11/15/99	Government of Venezuela	Fees	12,328.60
11/15/99	Government of Venezuela	Fees	37,751.25
11/15/99	Government of Venezuela	Disbursements	2,762.71
11/15/99	Government of Venezuela	Fees	242,065.00
11/15/99	Government of Venezuela	Disbursements	33,667.62
11/15/99	Government of Venezuela	Fees	166,932.50
11/15/99	Government of Venezuela	Disbursements	<u>20,741.53</u>
		Total Fees	\$647,665.17
		Total Disbs.	61,965.49

Government of Panama

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
08/26/99	Government of Panama	Fees	25,143.75
08/26/99	Government of Panama	Disbursements	2,255.84
09/14/99	Government of Panama	Fees	16,080.00

receipts cont'd.

09/14/99	Government of Panama	Disbursements	1,614.37
10/13/99	Government of Panama	Fees	2,160.00
10/13/99	Government of Panama	Disbursements	1,241.32
12/02/99	Government of Panama	Fees	7,560.00
12/02/99	Government of Panama	Disbursements	<u>712.47</u>
		Total Fees	\$50,943.75
		Total Disbs.	5,824.00

Kazakhstan

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
10/30/99	Kazakhstan	Fees	<u>50,000.00</u>
		Total Fees	50,000.00

**ATTACHMENT NO. 15A**

15.(a) **Disbursements -- Monies**

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, and 9 of this statement?

  X   Yes                                             No

- (2) transmitted monies to any such foreign principal?

       Yes                                        X   No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

**Note: The following information relates to activities that are non-registrable, as well as activities that are registrable.**

**The substantial majority of these monies was for charges related to services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended.**

**Note: The services to which these expenditures relate may have been performed in a prior period.**

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of Venezuela</u> (Note: Includes Registrable and/or Non-Registrable Activities)			
Various	Xerox Corporation	Duplicating	\$5,599.35
Various	C & P Telephone Company	Telephone	11,978.12
Various	A & P Employees	Local Transportation	2,112.38
Various	A & P Employees	Cash Expenses	3,036.07
Various	Westlaw	Computer Research	1,732.22
Various	Lexis	Computer Research	6.43
Various	A & P Attorneys	Travel Expenses*	59,257.19
7/8/99	U.S. Postal Services	Postage	.55
Various	Washington Express	Courier	331.15
Various	Federal Express	Courier	1,633.88

\* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meetings with clients and third parties, and not for registrable activities.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
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Government of Venezuela(Note: Includes Registrable and/or Non-Registrable Activities) (Con't.)

Various	Deluxe Delivery Service	Courier	1,242.00
7/19/99	FARA Registration Unit	Filing Fee	305.00
9/16/99	Disclosure Incorporated	Document Retrieval	<u>25.00</u>
		TOTAL	\$87,259.34

State of Israel(Note: Includes Registrable and/or Non-Registrable Activities)

Various	Xerox Corporation	Duplicating	\$852.15
Various	C & P Telephone	Telephone	955.07
Various	U.S. Postal Services	Postage	13.10
Various	A & P Employees	Local Transportation	377.03
Various	A & P Employees	Cash Expenses	342.60
Various	Westlaw	Computer Research	1,443.95
Various	Washington Express	Courier	349.42
Various	Federal Express	Courier	86.00
Various	Deluxe Delivery Service	Courier	44.85
Various	A & P Attorneys	Travel Expenses*	311.60
7/19/99	FARA Registration Unit	Filing Fee	305.00
11/16/99	Superintendent of Documents	Publication	82.00
7/14/99	Federal News Services	Congressional Documents	<u>90.00</u>
		TOTAL	\$5,252.77

\* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meetings with clients and third parties, and not for registrable activities.

Republic of Panama (Note: Includes Registrable and/or Non-Registrable Activities)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
Various	Xerox Corporation	Duplicating	\$7,532.40
Various	C & P Telephone	Telephone	4,940.90
Various	U.S. Postal Services	Postage	16.86
Various	A & P Employees	Local Transportation	1,328.32
Various	A & P Employees	Cash Expenses	1,427.78
Various	Westlaw	Computer Research	4,226.29
Various	Lexis	Computer Research	720.51
Various	Washington Express	Courier	442.13
Various	Federal Express	Courier	831.41
Various	Deluxe Delivery Service	Courier	39.00
Various	DHL Airways	Courier	293.66
Various	A & P Attorneys	Travel Expenses*	34,902.25
9/8/99	Galindo, Arias & Lopez	Outside Counsel	10.80
Various	Language Innovators	Translation Services	5,076.42
9/28/99	Libreria El Campus Panama Books	Publication	47.58
10/14/99	Columbia University	Document Retrieval	55.00
10/26/99	Pacer Service Center	Document Retrieval	10.15
11/12/99	The British Library	Document Retrieval	37.71
8/12/99	FARA Registration Unit	Filing Fee	<u>305.00</u>
		TOTAL	\$62,244.17

\* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meetings with clients and third parties, and not for registrable activities.

### ATTACHMENT 15C

During this 6-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

☐ Yes ☒ No <sup>\*/</sup>

<sup>\*/</sup> However, persons who have filed Short-Form Registration Statements made the following political contributions in connection with elections for federal offices during this 6 month period:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
6/10/99	\$1,000.00	Gore 2000	Al Gore
6/14/99	\$ 167.50	Arnold & Porter Partners PAC	Various
6/14/99	\$ 250.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 115.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 200.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 50.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 200.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 175.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 225.00	Arnold & Porter Partners PAC	Various
6/14/99	\$ 85.00	Arnold & Porter Partners PAC	Various
7/21/99	\$ 250.00	Lazio for Congress	Rick Lazio
8/99	\$1000.00	Bill Bradley for President	Bill Bradley
8/11/99	\$ 250.00	Tom Lantos for Congress	Tom Lantos
9/3/99	\$1000.00	Citizens for Sarbanes	Paul Sarbanes
9/3/99	\$ 35.00	Montgomery Cty Demo. Cntrl Cmmttee	Various
9/13/99	\$ 100.00	HRC for U.S. Senate Exploratory Cmmttee	Hillary Clinton
9/13/99	\$ 250.00	Maryland Democratic Party	Various
9/13/99	\$ 167.50	Arnold & Porter Partners PAC	Various
9/13/99	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 115.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 200.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 50.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 200.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 175.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 225.00	Arnold & Porter Partners PAC	Various
9/13/99	\$ 85.00	Arnold & Porter Partners PAC	Various

10/13/99	\$1000.00	Lieberman 2000	Joseph Lieberman
11/1/99	\$2,000.00	HRC for U.S. Senate Exploratory Cmmttee	Hillary Clinton
11/4/99	\$1000.00	Bill Bradley for President	Bill Bradley
11/4/99	\$ 500.00	Richard Licht for Senate	Richard Licht
11/7/99	\$ 35.00	Maryland Dollars for Democrats	Various
11/20/99	\$ 100.00	Bill Bradley for President	Bill Bradley